COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

BP Amoco Oil Company - Yorktown Refinery
Yorktown, Virginia
Permit No. VA-60116

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, BP Amoco Oil Company has applied for a Title V Operating Permit for its Yorktown Refinery facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager:_____ Date:_____

Regional Permit Manager: _____ Date:_____

1. Facility Information

Permittee

BP Amoco Oil Company
P.O. Box 578
Yorktown, Virginia 23690

Facility

Yorktown Refinery
Route 173, 3 miles east of U.S. 17
Yorktown, Virginia 23690

Responsible Official

Felix R. Strater
Business Unit Leader
(757) 898-9701

Facility Contact

Peter Buckman
Environmental Specialist
(757) 898-9739

AIRS Identification Number: 51-199-00004
Registration Number: 60116

2. Source Description

The BP Amoco Oil Company - Yorktown Refinery operates under SIC Code Number 2911 as a petroleum refinery. The facility contains approximately twelve different units that are involved in one of the following four processes in converting crude oil into useable products: separation, conversion, treating, and blending. Process units can make a product that is immediately ready for retail, ready for blending into finished products, or one that requires further processing at another process unit. In addition to three top-quality gasoline products, the refinery manufactures other products including propane, butane, jet fuels, furnace oils, distillate fuels, petroleum coke, and sulfur. The BP Amoco Yorktown Refinery operates 24 hours per day, 365 days per year with an employee base of over 220 people. The throughput, or manufacturing capacity, is set by a combination of economic factors and physical equipment capacities. In 1994, the refinery processed an average of 56,000 barrels of crude oil per day (one barrel equals 42 gallons). The refinery in the past has refined up to 65,000 barrels of crude oil per day, however, the refinery's maximum capacity has not yet been demonstrated. The facility-s emission units are listed in the following table:

UNIT/PROCESS	DESCRIPTION
Units F1 and F2/Utility Boilers 1 and 2	Natural gas/No. 6 oil-fired boilers each rated at 140 mmBTU/hr
Unit F4/Coker Furnace BA-101	Natural gas-fired furnace rated at 97 mmBTU/hr

Unit F6/ULTRA Furnace F-101	Natural gas-fired furnace rated at 44 mmBTU/hr
Unit F8/ULTRA Furnace F-201	Natural gas-fired furnace rated at 28 mmBTU/hr
Unit F9/ULTRA Furnace F-301	Natural gas-fired furnace rated at 38 mmBTU/hr
Units F10 and F11/ULTRA Furnace F-302 A&B	Natural gas-fired furnaces each rated at 79 mmBTU/hr
Unit F12/ULTRA Furnace F-303	Natural gas-fired furnace rated at 50 mmBTU/hr
Unit F13/ULTRA Furnace F-304	Natural gas-fired furnace rated at 35 mmBTU/hr
Units F14 and F15/ULTRA Furnace F-305/6	Natural gas-fired furnaces each rated at 20 mmBTU/hr
Unit F16/ULTRA Furnace F-307	Natural gas-fired furnace rated at 13 mmBTU/hr
Unit F20/Crude Atmospheric/CO Furnace	Natural gas-fired furnace rated at 311 mmBTU/hr
Unit F21/Crude Vacuum Furnace	Natural gas-fired furnace rated at 79 mmBTU/hr
Unit P1/CRUDE	Crude oil processing rated at 3,200 barrels per hour
Unit P2/FCCU	Catalytic cracking process rated at 1,500 barrels per hour
Unit P3/POLY/ETHER	Poly/ether process each rated at 600 barrels per hour
Unit P4/TREATING	Treating process rated at 1,600 barrels per hour
Unit P5/COKER	Coker process rated at 1,100 barrels per hour
Unit P6/NDU/UF	NDU/UF process rated at 600 barrels per hour
Unit P7/DDU	DDU process rated at 1,100 barrels per hour
Units P8/SRU	SRU process rated at 3.1 long tons
Unit P9/BLEND/TANK	Tank blending processes, capacity unknown
Unit P10/LOADING	Tank Loading processes, capacity unknown
Unit P11/WWTP	Wastewater Treatment Plant, capacity unknown
Unit P12	Flare
Unit P13/UTILITIES	Construction prior to 1972, capacity unknown
Unit R1	Gasoline, distillate, petroleum products (Truck Loading Rack) rated at 85,600 gallons per hour
Unit R10	Marine loading of petroleum products rated at 420,000 gallons per hour
Unit R11	LPG/Butane (Truck Loading Rack) rated at 60,000 gallons

	per hour
Unit R12	LPG/Butane (Railcar Loading Rack) rated at 75,000 gallons per hour
Unit R2	Recovered hydrocarbons (Ultraformer/Utilities Oil/Water Separators), total capacity rated at 3,000 gallons per hour
Unit R3	Recovered hydrocarbons (Crude Unit Oil/Water Separators), total capacity rated at 3,000 gallons per hour
Unit R4	Recovered hydrocarbons (Coker Oil/Water Separators), total capacity rated at 3,000 gallons per hour
Units R5, R6, R7, and R8	Recovered hydrocarbons (Wastewater Treatment Plant, 4 CPI Separators) rated at 2,100 gallons per hour each
Unit R9	IGF Float (Induced Gas Flotation Unit) rated at 12,000 gallons per hour

3. Compliance History

The last inspection conducted on the facility by the Virginia Department of Environmental Quality, dated August 28, 2000, indicated the facility is in compliance with the registration requirements and the regulations. According to DEQ inspector comments from the August 28, 2000, inspection:

"DEQ staff did not detect operational deviations from the permit or regulations during the inspection. All emissions sources appeared to be structurally sound and in working order. Canvassing the area, there was minimal detection of odors that could be considered foul or offensive. Records were accessible within 24 hours of the initial request. Records reveal that reporting and monitoring requirements under the NESHAP, MACT, and NSPS are being satisfied by the source. The source was in compliance during the inspection."

The facility has several New Source Review Permits. Most combustion and process units at the facility are pre-1972 construction and currently have no permits. The crude oil processing furnace was added to the facility with the issuance of a permit dated December 20, 1977. The April 12, 1990, permit covers the coking unit process furnace. The ultraforming unit process furnaces were added as part of the September 28, 1990, permit. The coke crusher was added to the facility with the issuance of a permit dated December 26, 1990. The wastewater treatment plant is covered by a permit dated February 25, 1997. Finally, the ether unit received a permit on August 19, 1998. As such, the facility is subject to both the Existing Source regulations as specified in 9 VAC 5 Chapter 40 of the Virginia Regulations for the Control and Abatement of Air Pollution and the New and Modified Source regulations as specified in 9 VAC 5 Chapters 50 and 80.

In December of 2000, a Consent Order was finalized between EPA and BP Amoco. At this time, final details of the Consent Order are not available. However, the Consent Order contains applicable federal requirements and as such will be incorporated into this Title V permit by reference. The case involved alleged violations by BP Amoco in the construction and operation of the ether unit and compressor known as J-135B and the compressor known as J-135A without a permit. In addition, BP Amoco was cited for alleged violations of recordkeeping, reporting, and monitoring requirements under 40 CFR 60 for the ether unit and compressor J-135B. On August 19, 1998, BP Amoco received a permit for the ether unit and the two compressors. In addition, BP Amoco entered into a Consent Order on January 10, 2000, to address the alleged violations contained in Notices of Violation dated June 29, 1999, and November 15, 1999. The Consent Order required BP Amoco to pay a civil charge that was paid by BP Amoco on February 10, 2000.

4. Emissions Inventory

An emissions update was received for calendar year 1997. Emissions estimates were provided by BP Amoco that resulted in a fee bill of $274,947.67. The Title V fee bill was paid in full to the Virginia Department of Environmental Quality on September 23, 1997, which was before the October 1, 1997, deadline.

Total billable emissions were 8,541.4 tons with a Title V fee of $32.19 per ton.

5. Applicable Requirements

a. Emission Unit Applicable Requirements

There are numerous federal regulations applicable to some of the units at the BP Amoco Yorktown Refinery facility. They are as follows:

< 40 CFR Part 60.104(a)(1) - Subpart J - Standards for Sulfur Oxides. This standard applies to Unit Nos. P1 (Crude processing), P5 (Coker Furnace BA-101), and P6 (Furnace F-302 A&B and Furnace F-305-6).

< 40 CFR Part 60.590 - Subpart GGG - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries. This standard applies to Unit Nos. P1 (Crude processing vacuum compressor J135B), P3 (Ether Unit), and P6 (NDU/UF Depentanizer Distillation Column).

< 40 CFR Part 60.482-3 - Subpart VV - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry - Compressors. This standard applies to Unit No. P1 (Crude processing vacuum compressor J135B) and Unit P3 (Ether Unit).

< 40 CFR Part 60 - Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems. 40 CFR Part 60.692-2 Standards: Individual Drain Systems. This standard applies to Unit No. P11 (Coker process ISBL New underground sewer). 40 CFR Part 60.693-1 Alternative Standards for individual drain systems. This standard applies to Unit P11 (Wastewater Treatment Plant OSBL Above Ground Sewer). 40 CFR Part 60.692-3(a)&(b) Standards: Oil-water separators. This standard applies to Unit P11 (Wastewater Treatment Plant - four CPI Separators and ultraformer, crude unit, and coker oil-water separators). 40 CFR Part 60.692-5 Standards: Closed vent systems and control devices. This standard applies to Unit P11 (carbon canister controls on Units R5 through R9, R2 through R4, and the closed vent system to carbon canister controls on R2-R4 and R5-R9).

< 40 CFR Part 60.112 - Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. This standard applies to Unit P9 (Storage Tanks 23, 24, 907, 908, 909, 910, 911, and 912).

< 40 CFR Part 60.112b(a)(2) - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. This standard applies to Unit P9 (Storage Tanks 23, 24, 907, 908, 909, 910, 911, 912, and 913) and Unit P10 (Loading - storage tanks).

< 40 CFR Part 61 - Subpart FF - National Emission Standard for Benzene Waste

Operations. 40 CFR 61.351 (a)(2) Alternative Standards for Tanks. This standard applies to Unit No. P10 (Loading - storage tanks). 40 CFR 61.346(b)(3) Standards: Individual Drain Systems. This standard applies to Unit P11 (Wastewater Treatment Plant - OSBL Above Ground Sewer and underground ISBL sewers in benzene service). 40 CFR 61.348(b)(2) Standards: Treatment Processes. This standard applies to Unit P11 (Wastewater Treatment Plant - Activated Sludge Plant). 40 CFR 61.347 Standards: Oil-water Separators. This standard applies to Unit P11 (Wastewater Treatment Plant - four CPI separators and ultraformer, crude unit, and coker oil-water separators). 40 CFR 61.348(b)(1) Standards: Treatment Processes; and 61.343(a), (c), and (d) Standards: Tanks. These standards apply to Unit P11 (Wastewater Treatment Plant - IGF). 40 CFR 61.349(a)(1) Standards: Closed-vent systems and control devices. This standard applies to Unit P12 (Flare - Closed vent system to carbon canister controls on Units R2-R4 and R5-R9). 40 CFR 61.349(a)(2) Standards: Closed-vent systems and control devices. This standard applies to Unit P11 (Wastewater Treatment Plant - carbon canister controls on Units R2-R4 and R5-R9).

< 40 CFR Part 61 - Subpart J - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene. This standard applies to Unit P12 (Flare - RV header on benzene service relief valves and refinery flare).

< 40 CFR Part 61 - Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources). This standard applies to all units at the facility in benzene service (greater than 10% benzene). 40 CFR 61.242-4(c) Standards: Pressure relief devices in gas/vapor service. This standard applies to Unit P12 (Flare - RV header on benzene service relief valves). 40 CFR 61.242-11(d) Standards: Closed-vent systems and control devices. This standard applies to Unit P12 (Refinery flare).

< 40 CFR Part 63 - Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries. 40 CFR 63.646 Storage Vessel Provisions. This standard applies to Unit P9 (Tank Blending Processes - Tanks 100 and 106).

< 40 CFR Part 63 - Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater. 40 CFR 63.119 Storage Vessel Provisions - reference control technology. This standard applies to Unit P9 (Tank Blending Processes - Tanks 100 and 106).

< 40 CFR Part 63 - Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries. 40 CFR 63.650 Gasoline Loading Rack Provisions. This standard applies to Unit P10 (Tank Loading Processes - gasoline truck loading rack and VCU). 40 CFR 63.648(a) Equipment Leak Standards referencing 40 CFR 60.482-4(c) Subpart VV. This standard applies to Units P12 (Flare - RV header on HAP service relief valves), P13 (Utilities - refinery flare and auxiliary flare when controlling a HAP relief valve), and all facility components in organic HAP service. 40 CFR 63.643(a)(1) Miscellaneous Process Vent Provisions. This standard applies to all Group 1 Miscellaneous process vents at the facility.

< 40 CFR Part 68 - Chemical Accident Prevention Provisions. This standard applies facilitywide and encompasses work practice provisions including a Risk Management Plan as specified in 40 CFR 68 - Subpart G.

Other applicable requirements that apply to the source are the following provisions of the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution:

9 VAC 5 Chapter 20	General Provisions Part II: Air Quality Programs, Registration
9 VAC 5 Chapter 40	Existing Stationary Sources
9 VAC 5 Chapter 40	Article 1: Visible Emissions and Fugitive Dust/Emissions
9 VAC 5 Chapter 40	Article 2: Emissions Standards for Odor (State Only)
9 VAC 5 Chapter 40	Article 4: Emission Standards for General Process Operations
9 VAC 5 Chapter 40	Article 8: Emission Standards for Fuel Burning Equipment
9 VAC 5 Chapter 40	Article 11: Emission Standards for Petroleum Refinery Operations
9 VAC 5 Chapter 40	Article 22: Emission Standards for Sulfur Recovery Operations
9 VAC 5 Chapter 40	Article 37: Emission Standards for Petroleum Liquid Storage and Transfer Operations
9 VAC 5 Chapter 40	Article 40: Emission Standards for Open Burning (State Only)
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 50	Article 1: Visible Emissions and Fugitive Dust/Emissions
9 VAC 5 Chapter 80	Part I: Permits for New and Modified Sources
9 VAC 5 Chapter 80	Article 1: Federal Operating Permits for Stationary Sources
9 VAC 5 Chapter 80	Article 2: Permit Program Fees for Stationary Sources
9 VAC 5 Chapter 80	Article 4: Insignificant Activities
9 VAC 5 Chapter 80	Article 8: Permits for Major Stationary Sources and Major Modifications Locating in Prevention of Significant Deterioration Areas
Consent Orders	Consent Order with DEQ dated January 31, 1996, for storage tanks to install secondary seals prior to the end of 1998 for Tanks 104 and 107and prior to the end of 1999 for Tanks 101-110, 300, 301, 600-602, 604-606, 608-617, 619-622, 700-702, and 907-912.
	Consent Order with DEQ dated August of 1988 for opacity from the Crude Atmospheric/CO Furnace, Crude Vacuum Furnace, and the FCCU regenerator. Consent Order requires the use of Continuous Opacity Monitors (COMs) for the Crude and FCCU processes.
	Consent Order with DEQ dated 1998 for the Ether

Unit and compressors.

Consent Order with EPA dated December of 2000.

b. Generally Applicable Requirements

Generally applicable requirements which apply to the source are the following provisions of the Commonwealth of Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution:

9 VAC 5 Chapter 170	General Administration
9 VAC 5 Chapter 80	Article 2: Permit Program Fees for Stationary Sources

c. Periodic Monitoring Requirements

The BP Amoco-Yorktown Refinery Title V permit is subdivided into several operational-specific categories. Each section covers emissions units that correspond to their respective categories. Each section includes emissions and operational limitations, and testing, monitoring, reporting, and recordkeeping requirements.

Combustion Sources

Emissions of CO, NO_x, PM, PM-10, and TSP from all of the combustion units at the facility shall be monitored by keeping records of throughput, type of fuel used, and appropriate data on fuel properties. Emissions shall be calculated by BP Amoco monthly as the sum of each consecutive 12-month period for all pollutants other than SO_2 using Chapter 1, Sections 3 and 4 of AP-42, 5th Edition, Supplement B or other appropriate emission factors as approved by DEQ.

Units F4 (coker furnace BA-101), F14 and F15 (Furnace F-305/6), F10 and F11 (Furnace F-302 A&B) all are permitted sources. Those combustion sources that are subject to 40 CFR 60 Subpart J (Units F4, F10, F11, F14, and F15) shall demonstrate compliance with the SO_2 emission limitations by the use of an H_2S CEM. The CEM shall continuously monitor and record the concentration (dry basis) of H_2S in fuel gases before being burned in any fuel gas combustion device (Condition II.E.c.1 of the Title V permit). Because all combustion units are on a common fuel gas system, SO_2 emissions shall be monitored and estimated using the H_2S CEM required for the Subpart J-affected sources. Should the H_2S CEM not be available to monitor H_2S and estimate SO_2 emissions, then emissions from the non-NSPS furnaces shall be monitored by fuel gas H_2S analysis at a frequency of once per 8-hour shift. One analysis is acceptable for all furnaces on any common fuel gas system. Performance evaluations for the CEM shall use Performance Specification 7. EPA Method 11 shall be used for conducting CEM relative accuracy evaluations. Should any of the combustion sources be directly supplied with 100% natural gas, monitoring of H_2S for that unit will not be required. The permittee shall maintain records of calculations used to demonstrate compliance with the CO, NO_x, PM, PM-10, and TSP emission limitations. The permittee shall also maintain records of CEM data for SO_2 emissions limitations such that the permittee can demonstrate compliance for any 12-month rolling period. In addition, the permittee shall maintain a logbook on site which includes all periods of H_2S CEM downtime, periods of 100% natural gas usage for each of the combustion units, and any fuel gas H_2S analyses required by Condition II.C.1.c.2 of the Title V permit. The permittee

shall likewise maintain records of any CEM performance and relative accuracy evaluations required by Condition II.C.1.e.2 of the Title V permit.

FCCU

The FCCU is subject to PM and SO_2 emission limitations. To demonstrate compliance with the PM limitations of 9 VAC 5-40-1360, BP Amoco shall perform a reconciliation of catalyst flow rate analysis, an addition rate analysis, and an estimated loss in product analysis on a monthly basis. To demonstrate compliance with the SO_2 concentration limitation of 9 VAC 5-40-1370, BP Amoco shall monitor the FCCU feed sulfur content once daily and determine the SO_2 concentration by empirical correlation. BP Amoco shall use the above data to calculate concentrations of PM and SO_2 from the FCCU monthly as the sum of each consecutive 12-month period.

Coke Crusher

Conditions 3, 4, and 5 of the December 26, 1990, Permit to Construct and Operate require the use of wet suppression on feed coke, the feed coke hopper, the coke crusher discharge, and coke screening. Compliance with the wet suppression requirements of the 12/26/90 permit shall demonstrate compliance with TSP and PM-10 limits. BP Amoco shall keep records of periods when the coke crusher was operated without required wet suppression and an explanation of the weather conditions (i.e., rain, extreme cold) which precluded the use of wet suppression. The presence of any visible emissions from the operation of the coke crusher shall prompt the use of wet suppression.

SRU

BP Amoco shall demonstrate compliance with the SO_2 concentration and emission limitation requirements of 9 VAC 5-40-3000 by the use of an annual performance stack test.

Ether Unit

A permit to construct and operate dated August 19, 1998 covers the ether unit. Condition 3 of the 8/19/98 permit requires that the source comply with the Federal emissions requirements under 40 CFR 60 Subpart GGG and Subpart VV. The condition also requires that the source comply with the requirements of 40 CFR 60.482-1 through 40 CFR 60.482-10, which includes all monitoring provisions under these Subparts.

NSPS Subpart J - SO_2 Emissions from Fuel Gas Combustion Units

Units F4, F10, F11, F14, and F15 are subject to this subpart and shall demonstrate compliance with the SO_2 via H_2S emission limitations by compliance with the monitoring provisions in 40 CFR 60.105(a)(4) and 60.105(a)(4)(i). These provisions require the use of an H_2S CEM to calculate SO_2 emissions.

NSPS Subpart Kb - Volatile Organic Liquid Storage Vessel for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

Tanks 23, 24, 907, 908, 909, 910, 911, and 912 are subject to this subpart. Amoco shall perform monitoring of operations as required by 40 CFR 60.116b(c). For each subject vessel, BP Amoco shall maintain a record of the type of volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of each volatile organic liquid during its respective storage period. The source may use available data on the storage temperature of the VOL to determine the maximum true vapor pressure by following the procedures outlined in 40 CFR 60.116b(e)(1) through (3). In addition, BP Amoco shall follow all testing requirements of 40 CFR 60.113b(2) including required seal gap measurements under 40 CFR 60.113b(b)(2) through (4). Amoco shall submit reports and

maintain records as required in 40 CFR 60.115b(b) and in the testing requirements of 40 CFR 60.113b(b).

40 CFR 63 Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries

Tanks 100-110, 300, 301, 409, 600-602, 604-622, and 700-702 are subject to these provisions. BP Amoco shall monitor compliance with these provisions through the applicable monitoring, reporting, and recordkeeping provisions of this subpart. BP Amoco shall comply with the control requirements of 40 CFR 63.119 through 121 as referenced by 40 CFR 63.646. This provision applies once a tank becomes subject to the rule by the first degassing and cleaning activity after August 18, 1998, or within 10 years after August 18, 1995, whichever is first. BP Amoco shall submit reports of testing and monitoring in accordance with the requirements of 40 CFR 63.120 as referenced by 40 CFR 63.646. In addition, BP Amoco will keep records as specified in 40 CFR 63.123.

The gasoline truck loading rack vent and the VCU are subject to the provisions of 40 CFR 63.650 Subpart CC. The source shall demonstrate compliance by complying with the testing, monitoring, recordkeeping, and reporting requirements of 40 CFR 63.425(a) through (c) and (e) through (h), 40 CFR 63.427(a) and (b), and 40 CFR 63.428(b), (c), (g)(1), and (h)(1) through (h)(3) as specified in 40 CFR 63.650.

All Group 1 Miscellaneous Process Vents are subject to the provisions of 40 CFR 63.643(a)(1). BP Amoco shall monitor the control device and bypasses on each Group 1 Miscellaneous Process Vent in accordance with the monitoring provisions of 40 CFR 63.644.

All facility components in organic HAP service are subject to the Equipment Leak Standards of 40 CFR 63.648. This provision requires the establishment of a Leak Detection and Repair Program (LDAR). Monitoring of components shall be performed in accordance with the provisions of 40 CFR Part 60 Subpart VV and 40 CFR 63.648.

The Wastewater Treatment Plant and all underground ISBL sewers in benzene service are subject to the National Emission Standard for Benzene Waste Operations in 40 CFR Part 61 Subpart FF. BP Amoco shall demonstrate continuing compliance with these standards through the specific monitoring, recordkeeping, and reporting provisions of 40 CFR 61.354, 61.355, 61.356 and 61.357.

In addition, the permittee shall comply with the specific monitoring, recordkeeping, and reporting provisions of the December 2000 Consent Order with EPA and any other Consent Orders in force with DEQ and/or EPA. The proposed periodic monitoring scheme outlined above is deemed sufficient to ensure compliance with all limitations established in the Title V permit. Therefore, no additional recordkeeping is required for this permit.

6. Future Applicable Requirements

There are no future applicable requirements for this facility at this time.

7. Inapplicable Requirements

None.

8. Exclusions

There are no specific exclusions for this source.

9. Determinations

There were no specific determinations made for this source.

10. Standard Terms and Conditions

There are no standard terms and conditions specific to this source category.

11. Insignificant Activities

The source has listed the following units as insignificant:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
P9	All fixed roof tanks	9 VAC 5-80-720 B.2.	VOC	Less than 5 tons per year VOC emissions
P9	All floating roof tanks storing hydrocarbons with a vapor pressure less than 1.5 PSI and no applicable requirements	9 VAC 5-80-720 B.2.	VOC	Less than 5 tons per year VOC emissions
Ubiquitous	LPG truck and railcar loading	5-80-720 B.2	VOC	Less than 5 tons per year VOC emissions
Ubiquitous	LPG storage	5-80-720 B.2	VOC	Less than 5 tons per year VOC emissions
Ubiquitous	Lube oil tanks and reservoirs and storage tanks less than 1000 gallons capacity	9 VAC 5-80-720 C.3.	NA	Less than 1000 gallons capacity
Ubiquitous	Emergency diesel engines operating less than 500 hours per year	9 VAC 5-80-720 C.4.b.	NA	Less than 6,667 horsepower

12. Public Participation

The draft permit was noticed in the Newport News *Daily Press* on August 21, 2001.

13. Confidentiality

The source has not requested confidentiality for any information submitted in the Title V application or in support of the Title V application.